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Wachovia Bank, National Association

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

WACHOVIA BANK, National Association,

Plaintiff,

- against -

CASA DE CAMBIO MAJAPARA S.A. de C.V. a/k/a
MAJAPARA CASA DE CAMBIO S.A. de C.V.,

Defendant.

X

07 Civ. 11230 (BSJ)(RLE)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Scott S. McKessy dated February 11, 2008, the exhibits annexed thereto, the accompanying Memorandum of Law, and all proceedings had herein, plaintiff Wachovia Bank, National Association (“Wachovia”) will move this Court at the United States District Courthouse, 500 Pearl Street, Room 18B, New York, New York, at a date and time designated by the Court, for an Order:

(a) Holding Majapara in contempt of this Court's Orders dated December 14, 2007 and January 8, 2008;

(b) Directing that Majapara deposit into Court an amount sufficient to satisfy Wachovia's claims against Majapara;

(c) Directing that Majapara compensate Wachovia for its attorney's fees incurred in making the instant application;

(d) Directing that Majapara provide a full and complete verified disclosure of all of its assets (including, but not limited to, its accounts receivables), along with copies of Majapara's

audited and unaudited financial statements covering the last six months (including, but not limited to, whatever financial statements Majapara used in connection with its pending motion to vacate, claiming to have been a \$90 million-going-concern as of December 31, 2007);

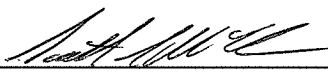
(e) Directing that Majapara provide documents relevant to the Euros transferred pursuant to the underlying spot transactions (including, but not limited to, the names, addresses, and account numbers of each entity or individual that received any of the Euros transferred in connection with the underlying spot transactions);

(f) Directing that Majapara produce Jorge Ortiz, at the offices of Reed Smith, 599 Lexington Avenue, New York, New York, for immediate deposition regarding Majapara's assets, financial condition, and conduct since December 14, 2007; and

(g) Awarding Wachovia such other, further, and different relief as the Court deems just, proper, and equitable.

Dated: New York, NY
February 11, 2008

REED SMITH LLP

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